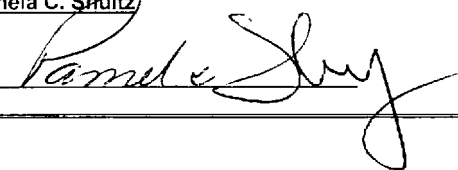


IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants:	Christian Gehrmann et al.	§	Group Art Unit:	2136
		§		
Serial No:	09/692,709	§	Examiner:	Hoffman, Brandon
		§		
Filed:	October 19, 2000	§	Confirmation No:	7545
		§		
Attorney Docket No: P12266/45687-00036				
Customer No.: 27045				

For: Method and Arrangement in a Communication Network

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

<p align="center"><u>CERTIFICATE OF MAILING OR TRANSMISSION</u></p> <p>I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage for First class or Express mail in an envelope addressed to Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, or being facsimile transmitted to the USPTO at (571) 273-8300 or transmitted via EFS-Web (Beta) on the date indicated below.</p> <p>Date: <u>May 25, 2006</u></p> <p>Name: <u>Pamela C. Shultz</u></p> <p>Signature: </p>
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Dear Examiner:

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Issues regarding the Pre-Appeal Brief Request are as follows:

PENDING REJECTIONS

Claims 1, 4-6, 17 and 18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Merging and Extending the PGP and PEM Trust Models – The ICE-TEL Trust Model, Chadwick et al, May/June 1997 (hereinafter referred to as Chadwick et al.) in view of Hunt et al. (U.S. Patent No. 5,539,881). Remaining dependent Claims 7-16 and 19-23 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chadwick et al. in view of Hunt et al. and further in view of Morris et al. (U.S. Patent No. 6,691,173).

ARGUMENTS

While combining the Hunt reference with the Chadwick reference in rejecting the pending independent Claims, the Examiner stated the necessity to introduce the Hunt reference by stating that "Chadwick et al. does not teach distributing trust relationships between all members in the trust group and the candidate node by means of the x-node distributing the public key associated with said candidate node to said all members of the trust group." However, the Examiner then stated that "Hunt et al. teaches distributing the public keys and trust relations between all members in the trust group and the candidate node by means of the X-node distributing the public key associated with said candidate node to said all members of the trust group (col. 1, line 42 through col. 2, line 3)."

The Applicant respectfully submits that the Hunt reference still fails to disclose or teach the recited step of claim 1:

"distributing trust relationship between all members in the trust group and the candidate node by means of the X-node distributing the public key associated with said candidate node to said all members of the trust group and wherein x-node further sending a signed message comprising a list of nodes that the x-node trusts within the ad hoc communication network and all corresponding public keys to the candidate node."

Furthermore, in accordance with the teachings of the present invention, the Chadwick as well as Hunt fails to disclose or teach the step of:

"identifying **any node** within the trust group having a trust relationship with the candidate node, the node having the trust relationship with the candidate node being **an X-node**."

In other words, in accordance with the teachings of the present invention, any node within the trust group having a trust relationship with the candidate

node is first identified as an "X-node." This X-node then establishes the trust relations between all members of the trust group and the candidate node by distributing the public key associated with the candidate node to all members of the trust group. In further accordance with the teachings of the present invention, this X-node also sends a signed message comprising a list of nodes that the x-node trusts within the ad hoc communication network and all corresponding public keys to the candidate node as well. The Applicant respectfully submits that nothing in Hunt discloses or teaches the above steps.

In response to the Applicant's argument traversing the Examiner's rejection, the Examiner further stated on his Final Office Action (dated March 29, 2006) that:

"Regarding applicant's argument, examiner disagrees. First, Hunt et al. teaches, on column 3, lines 16-20 that network element 100 may be either a DSNE or a remote NE. This means that any network element has the opportunity to become the DSNE, or X-node." In that regard, the Applicant respectfully disagrees with the Examiner's understanding of the Hunt reference. Col. 3, lines 16-20 of Hunt merely states that a DSNE network element (100) can be employed as either a DSNE or a remote Network Element (NE) in a telecommunications management network. However, whether deployed as a local NE or a remote NE, only the identity of this particular DNSE network element is then supplied to each newly reachable network element as it is added to the network (Hunt. Col. 1, lines 49-64). Accordingly, it is not "any node within the trust group having a trust relation with the candidate node" that is being identified as an "X-node" in accordance with the teachings of the present invention. Instead, a particular network element (whether local or remote) is first identified as the DSNE in the HUNT reference and it is the identity of this pre-designated DSNE that is provided to a newly reachable network element that is being added to the network. Furthermore, the Examiner further states that in Hunt, it is the remote NE (candidate node) that receives information from other nodes and transmits its information to the other nodes (page 9, second paragraph of the Final Office Action issued on March 29, 2006). However, as


clearly recited in the present application, it is the "X-node" and not the candidate node that distributes the public key associated the candidate node to all other members of the trust group. Furthermore, it is the X-node and not the candidate node that further sends a signed message comprising a list of all trusted nodes and corresponding public keys to the candidate node. Accordingly, even based on the Examiner's own understanding of the Hunt reference, the present invention is different and distinguishable from the Hunt reference.

Because the Hunt reference, independently or in combination with Chadwick, fails to anticipate or render obvious each and every element of the pending independent claims, the Applicant respectfully submits that independent Claims 1 and 17 and their respective dependent claims are in condition for allowance. A favorable consideration by the Pre-Appeal Review Panel is respectfully requested.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Panel withdraw all rejections and issue a Notice of Allowance for all pending claims.

Respectfully submitted,



By John C. Han
Registration No. 41,403

Date: May 25, 2006

Ericsson Inc.
6300 Legacy Drive, M/S EVR 1-C-11
Plano, Texas 75024

(972) 583-7686
john.han@ericsson.com